



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JAM  
F. #2019R00989

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 19, 2023

By ECF

Kevin K. Tung, Esq.  
Kevin Kerveng Tung P.C.  
136-20 38th Avenue Ste. 3D  
Flushing, NY 11354

By ECF and Email

Re: United States v. Shujun Wang  
Criminal Docket No. 22-230 (MKB)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, including:

- the defendant's iCloud account, Bates numbered WS0011;
- chat logs, Bates numbered WS0012-WS0013;
- FBI FD-302 reports, Bates numbered WS0014-WS0105;
- search warrants and related materials, Bates numbered WS0106-WS0244; and
- defendant's records and translations, Bates numbered WS0283-WS0403.

Please note that all of the items being produced have been designated as "Sensitive Discovery" under the terms of the September 6, 2022 Protective Order, ECF Docket No. 20, and that all translations are in draft form and subject to change. You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling me to arrange a mutually convenient time.

The government reiterates its request reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Artie McConnell  
Artie McConnell  
Assistant United States Attorney  
(718) 254-7150

Enclosures

cc: Clerk of the Court (MKB) (by ECF) (without enclosures)